

EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE

JANE C. FORRESTER WINNE; SARAH)
N. COFFEY; VICKIE L. MCMULLEN;)
KARIN A. HILLS; on behalf of herself and)
all others similarly situated,)

Plaintiffs,)

v.)

NATIONAL COLLEGIATE STUDENT)
LOAN TRUST 2005-1; et al.,)

Defendants.)

Civil Action Docket No:
1:16-cv-00229-JDL

AFFIDAVIT OF MATT MYERS

STATE OF California)

COUNTY OF San Diego)

NOW BEFORE ME, the undersigned authority, personally came and appeared

MATT MYERS,

who, after being duly sworn, did depose and state:

1. My name is Matt Myers. I am over eighteen years of age and am competent and authorized to make the following Affidavit based on my experience with Turnstile Capital Management, LLC ("Turnstile").

2. I am the Senior Vice President for Turnstile. I have been in that role since 2012. I am duly authorized by Turnstile to make the representations contained in this Affidavit and am competent to testify to the matters stated in this Affidavit.

3. I am competent and authorized to testify relating to this action. As Senior Vice President, I am familiar with and have personal knowledge of Turnstile's business practices, policies and procedures. I also have personal knowledge of the business records maintained by Turnstile relating to the management of debt portfolios. Such records are compiled and recorded as part of Turnstile's regularly conducted business activity at or near the time of the event and from information transmitted from a person with knowledge of the accounts or events described within the business record. Such records are kept, maintained, and relied upon in the course of ordinary and regularly conducted business activity.

4. I have reviewed the allegations asserted by Jane Forrester Winne in the Second Amended Complaint. As it relates to the trust defendants in this case, National Collegiate Student Loan Trust 2005-1, National Collegiate Student Loan Trust 2005-3, National Collegiate Student Loan Trust 2006-3, National Collegiate Student Loan Trust 2007-1 (collectively, the "Trusts"), Turnstile does not perform any consumer facing collection services. While Turnstile does, for other clients, manage and refer accounts of outstanding debt for collection to third party collection agency vendors ("Collections Management"), it does not perform such role for the Trusts. Turnstile performs analytics services for the special servicer of the Trust portfolios. Turnstile has never had a Trust account placed for Collections Management and specifically, has not received plaintiff's account(s) for Collections Management or service. Turnstile never attempted to collect any Trust owned debt owed by plaintiff Winne. Turnstile has never sent letters or placed phone calls to plaintiff Winne demanding payment for debt in connection with the Trusts.

Turnstile has no involvement whatsoever in the collection of any Trust account owed by Winne and did not hire Transworld Systems, Inc. to collect on such accounts.

5. The same is true for plaintiffs Sarah Coffey (f/k/a Sarah Thurlow), Vickie McMullen, and Karen Hills. Turnstile has never had any involvement whatsoever in the collection or Collections Management of their accounts.

6. GSS Data Services, Inc. ("GSS Data Services") is a servicer to the Trusts that performs administration services. Such administration services are not related to collections. GSS Data Services is an affiliate of Turnstile and operates from the same mailing address.

7. In the fall of 2015, GSS Data Services mailed privacy notices for a number of portfolios including for certain Trust accounts. The notice mistakenly identified Turnstile in the return address, not GSS Data Services. A copy of the form notice is attached as Exhibit 1.

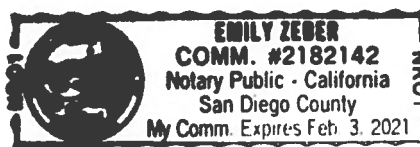
8. The privacy notice did not include a demand for the debt and was not accompanied by additional correspondence.

Executed the 24 day of October, 2017.

By: 
Matt Myers

SWORN TO AND SUBSCRIBED BEFORE ME

ON THIS 24 DAY OF October, 2017.





A handwritten signature in black ink, appearing to be 'J.M.', is written over a horizontal line.

NOTARY PUBLIC

My Commission Expires: 2/3/21

FACTS**WHAT DOES NCSLT DO WITH YOUR PERSONAL INFORMATION?**

Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> ■ Social Security number and income ■ account balances and payment history ■ transaction history and credit scores
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons NCSLT chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does NCSLT share?	Can you limit this sharing?
For our everyday business purposes—such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes—to offer our products and services to you	No	No
For joint marketing with other financial companies	No	No
For our affiliates' everyday business purposes—information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes—information about your creditworthiness	No	No
For our affiliates to market to you	No	No
For nonaffiliates to market to you	Yes	Yes

To limit our sharing	<ul style="list-style-type: none"> ■ Mail the form below <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	Call NCSLT Customer Service at 1-888-412-1299 if you have additional questions between the hours of 9:00 a.m. and 5:00 p.m. Pacific Standard Time.

**Mail-in Form**

Mark any/all you want to limit

- ☐ Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- ☐ Do not allow your affiliates to use my personal information to market to me.
- ☐ Do not share my personal information with nonaffiliates to market their products and services to me.

Account Number		Mail to: GSS Data Services, Inc. Attn: Privacy Policy 402 W. Broadway, Ste. 2000 San Diego, CA 92101
Name		
Address		
City, State, Zip		

Who we are	
Who is providing this notice?	The National Collegiate Student Loan Trusts and its affiliate GATE Holdings, Inc. (collectively referred to herein as “NCSLT”).
What we do	
How does NCSLT protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.</p> <p>We also require our servicers to maintain physical, electronic, and procedural safeguards that comply with federal standards to protect your personal information.</p>
How does NCSLT collect my personal information?	<p>We collect your personal information, for example, when you;</p> <ul style="list-style-type: none"> ■ apply for a loan ■ give us your income information or wage statements ■ give us your contact information or pay us by check <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Our affiliates include VCG Special Opportunities Master Funds Limited.</i>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ <i>Nonaffiliates we share with can include student loan lenders and servicers, retailers of education-related services, and nonprofit organizations.</i>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. NCSLT doesn't jointly market.
Other important information	
<p>California and Vermont Customers</p> <p>For California Residents Only – If you live in California, we will not share your personal information with nonaffiliates, except for our everyday business and marketing purposes, or if you agree to such sharing on a separate form that we will send you. California residents do not have to contact us to implement these limits on our sharing.</p> <p>For Vermont Residents Only – If you live in Vermont, we will not share your personal information with nonaffiliates, except for our everyday business and marketing purposes or if you agree to such sharing on a separate form that we will send you. Also, we will not share information about your creditworthiness with affiliates unless you agree to such sharing. We may share information about your transactions and experiences with affiliates for their everyday business purposes and to market to you, but you can stop them from using the information in marketing by checking the box marked “Do not allow your affiliates to use my personal information to market to me,” on the Mail-in Form above. Vermont residents do not have to contact us to implement any other limits on our sharing.</p>	